

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI

ROBIN HURLBURT,

Plaintiff,

v.

LOHR DISTRIBUTING CO., INC.,

Defendant.

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Case No. 4:17-cv-02733

SWORN AFFIDAVIT OF BONNIE M. DREPPARD

COMES NOW, Bonnie M. Dreppard, being duly sworn and upon her oath and states as follows:

1. My name is Bonnie M. Dreppard and I am over the age of 18 and am competent to provide this Sworn Affidavit.

2. I have firsthand knowledge of the facts stated herein.

3. I am currently employed by McMahon Berger, PC.

4. On December 12, 2018, I was working at the front desk in the lobby area at McMahon Berger, PC.

5. Shortly before 9:00 a.m. on December 13, 2018, attorney Mr. Daniel Harvath and his client Ms. Robin Hurlburt entered the lobby area and after speaking briefly with a McMahon Berger attorney, Mr. Thomas McCarthy, Mr. Harvath advised me that he needed to speak with attorney Robert Younger. I said I would check to see if they are ready for them and if not, they could wait in the small conference room. Mr. Harvath said, "we won't be here long."



6. I went into the conference room where Mr. Younger was waiting to start the deposition of Ms. Hurlburt with Mr. Corey Wallis and the Court Reporter. I informed Mr. Younger that Mr. Harvath requested to speak with him.

7. Mr. Younger and I went to the Lobby where Mr. Harvath and Ms. Hurlburt were waiting.

8. I heard Mr. Harvath say to Mr. Younger that he had a problem with the person that was in the deposition on behalf of Defendant. Mr. Harvath stated that is the guy who harassed and intimidated his client and called her a "whore". Mr. Harvath's comment about calling Ms. Hurlburt a "whore" were very loud! Mr. Harvath requested Mr. Younger have Mr. Wallis leave the conference room where Ms. Hurlburt's deposition was scheduled to take place.

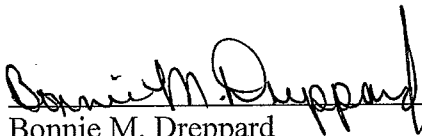
9. Mr. Younger simply replied "No."

10. Mr. Harvath then turned and began walking to the elevator and said "you can file whatever motion you want, I will have fun discussing this in front of the Judge." Mr. Younger then indicated that he intended to make a record before the Court Reporter and invited Mr. Harvath to join him and make a record, to which Mr. Harvath responded "No. I am not going to waste my time." Mr. Younger then returned to the conference room.

11. As Mr. Harvath and Ms. Hurlburt were waiting for the elevator I overheard Ms. Hurlburt ask Mr. Harvath "What was that all about?" Mr. Harvath replied "Get on the elevator."

12. Mr. Harvath and Ms. Hurlburt got on the elevator and left.

I swear that the above statement is true and accurate.


Bonnie M. Dreppard

STATE OF MISSOURI)
)SS
COUNTY OF ST. LOUIS)

Subscribed and sworn to before me this 14th day of December, 2018.

Daniela Mangione
Notary Public

My Commission Expires: .

